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*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO/OAKLAND DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others similarly  
situated, as a Class, and Subclass  
**PLAINTIFFS,**

vs.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, et al**  
**DEFENDANTS.**

No. 3:19-cv-07423 JSC

[Proposed] ORDER FOR  
TEMPORARY RESTRAINING  
ORDER

After considering plaintiffs DANIEL GONZALEZ, et. al.'s application for a temporary restraining order against defendants, ALAMEDA COUNTY SHERIFF'S OFFICE, WELLPATH, and ARAMARK, as well as the pleadings and affidavits the Court FINDS as follows:

1. Plaintiffs will likely suffer the following immediate and irreparable injury, loss or damage: to wit, infection with COVID-19, and all the attendant injuries and dangers that the corona virus can inflict, including and up to death.

2. This injury is irreparable because there is no remedy or cure for the corona virus, and main tool is prevention and palliative care.

3. Defendants Alameda County Sheriffs' Office and Alameda County were personally served on May 8, 2020. Courtesy notice of plaintiffs' application for temporary restraining order was provided to Defendant WellPath's and Aramark's attorneys.

For these reasons, the Court ORDERS:

The Defendant Alameda County Sheriffs' Office shall implement:

1. Testing within Santa Rita Jail for the corona virus;

- a. Universal testing for those pending incarceration and those currently incarcerated
- b. Universal testing for those who work in the jail setting
- c. Testing all prisoners who have tested positive for covid-19 to confirm that they are in fact not infectious before returning them to the general population;

2. Adequate Prevention Measures

- a. Mandate physical distancing and masking
- b. Allow and facilitate frequent hand-washing and adequate hygiene materials
- c. Maintain and apply appropriate cleaning and sanitation techniques to all surfaces in prisoner housing units per CDC Guidelines: [https:// https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html](https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html)
- d. Immediately cease all sharing of personal equipment and medical appliances such as asthma inhalers;
- e. No transport into or cleaning of coroner's laundry in Santa Rita Jail.

3. Adequate Medical Service

- a. A thorough examination by a qualified health professional to evaluate risk of severe disease and need for hospitalization of every prisoner who has tested positive for covid-19;
- b. Monitor vital signs at least two times per day to detect and intervene upon fatal respiratory complications early;
- c. Appropriate accommodations for people with disabilities;
- d. Ensure access to medications including antipyretics and pain relievers;

- e. Ensure optimal management of any underlying chronic conditions;
- f. Ensure access to normal palliative measures for sick people, including warm blankets, running water, cool wash cloths, hot beverages, sports drinks, cough drops, and other similar interventions to address the viral symptoms for COVID-19 positive or suspected positive inmates;
- g. Ensure frequent and ready access to hygiene facilities stocked with soap or sanitizer;
- h. Be given information about prognosis and disease status;
- i. Facilitate family and community support and contact; and
- j. :Provide meals that actually comport with the public menus that include daily servings of fresh fruit and vegetables;

DATED: May \_\_, 2020

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U.S. DISTRICT JUDGE